

05/05/2011 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 163357 **PERMIT#:** 7711A **STATUS:** PENDING
RECEIVED: 02/14/2011 **PROJTYPE:** REVISION **AUTHTYPE:** CONSTRUCT
RENEWAL: 10/21/2014
PROJECT ADMIN NAME: ADDITION OF CONTROL DEVICE
PROJECT TECH NAME: ASPHALT ROOFING PRODUCTION FACILITY

DISP CODE:**ISSUED DT:**

C DeW
5/17/11

Assigned Team: MECH/AG TEAM**RECEIVED****SEP 18 2013****STAFF ASSIGNED TO PROJECT:**

OYLER, TONI

- REVIEWR1_2 -

AP INITIAL REVIEW

STANFORD, JOEL

- REVIEW ENG -

MECH/AG TEAM

**TCEQ
CENTRAL FILE ROOM****CUSTOMER INFORMATION (OWNER/OPERATOR DATA)****ISSUED TO:** BUILDING MATERIALS CORPORATION OF AMERICA**COMPANY NAME:** Building Materials Corporation of America**CUSTOMER REFERENCE NUMBER:** CN602717464**REGULATED ENTITY/SITE INFORMATION****REGULATED ENTITY NUMBER:** RN100788959**ACCOUNT:** DB0378S**PERMIT NAME:** GAF MATERIALS**REGULATED ENTITY LOCATION:** 2600 SINGLETON BLVD**REGION 04 - DFW METROPLEX****NEAR CITY:** DALLAS**COUNTY:** DALLAS**CONTACT DATA****CONTACT NAME:** MR DOUG HARRIS**CONTACT ROLE:** RESPONSIBLE OFFICIAL**JOB TITLE:** ENGINEERING MANAGER**ORGANIZATION:** BUILDING MATERIALS CORPORATION OF AMERICA**MAILING ADDRESS:** 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738**PHONE:** (214) 637-8909 Ext: 0**PROJECT NOTES:**

02/15/2011 DFC 2/15/11.

PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL

TRACKING ELEMENTS:**TE Name****Start Date****Complete Date**

APIRT RECEIVED PROJECT (DATE)

02/14/2011

APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)

02/15/2011

CENTRAL REGISTRY UPDATED

02/15/2011

02/15/2011

PROJECT RECEIVED BY ENGINEER (DATE)

02/16/2011

FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE) 05/05/2011

FINAL PACKAGE REWORK CYCLE

FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)

UNIT TYPES:

Project Unit Type:

Permit Unit Type:

**Permit Alteration
Source Analysis & Technical Review**

Company	Building Materials Corporation of America	Permit Number	7711A
City	Dallas	Project Number	163357
County	Dallas	Account Number	DB-0378-S
Project Type	Revision	Regulated Entity Number	RN100788959
Project Reviewer	Mr. Joel Stanford	Customer Reference Number	CN602717464
Site Name	Asphalt Roofing Production Facility		

Project Overview

The company has requested an alteration of representation at their facility in order to add a scrubber to the cooling lines (Emission Point Numbers COOL1 and COOL3) in order to control particulate matter. The cooling lines currently have no controls. The installation is proposed in lieu of constructing stacks as specified in Special Condition 12 of the permit. These stack heights were required in order for the facility to demonstrate compliance with the PM₁₀ NAAQS. The company has indicated that they will perform stack tests and air dispersion modeling upon completion of the installation of the scrubber. Once the tests and modeling are complete the company will request the removal of Special Condition 12 and an adjustment to the emissions rates on the MAERT.

This alteration does not authorize an increase in emissions, change in method of control, or a change in character of emission.

 5/5/11
Project Reviewer Date

 5/6/11
Team Leader/Section Manager/Backup Date

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 17, 2011

MR DOUG HARRIS
ENGINEERING MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Alteration
Permit Number: 7711A
Asphalt Roofing Production Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN602717464
Account Number: DB-0378-S

Dear Mr. Harris:

This is in response to your letter received February 14, 2011, requesting alteration of the representations of the above-referenced permit. We understand that you propose to install a scrubber on the cooling line to control particulate matter emissions.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 7711A is altered. Please attach this letter to your permit.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance_support/qa/env_lab_accreditation.html

Mr. Doug Harris
Page 2
May 17, 2011

Re: Permit Number: 7711A

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Joel Stanford at (512) 239-0270 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/JS/js

Enclosure

cc: Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 163357



GAF MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

February 4, 2011

Mr. Joel Stanford
Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT)
12100 Park 35 Circle, Mail Code 163
Austin, Texas 78753

RECEIVED
FEB 14 2011
AIR PERMITS DIVISION

Re: TCEQ Permit No. 7711A Alteration

Building Materials Corporation of America. – Dallas Plant – Dallas County

TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959

Dear Mr. Stanford:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant has been issued TCEQ Permit No. 7711A (air quality construction permit). As discussed with TCEQ on January 28, 2011, pursuant to 30 TAC 116.116(c)(2), this letter is requesting approval for a permit alteration to Permit No. 7711A to add a control device to the cooling sections (Emission Point Numbers [EPNs] COOL1 and COOL3) to demonstrate compliance with the particulate matter with an aerodynamic particle size less than 10 microns (PM₁₀) National Ambient Air Quality Standard (NAAQS) versus the previously proposed stack height increases.¹ This proposed change will reduce emissions of PM₁₀ and will result in reduced off-site impacts.

1. BACKGROUND

GAF submitted a New Source Review (NSR) Permit Amendment Application to the TCEQ on December 18, 2008. As a part of the NSR Permit Amendment Application, GAF proposed to increase the stack heights for EPNs COOL1 and COOL3 in order to comply with the NAAQS for PM₁₀ emissions. The proposed stack heights were included in the NSR Permit issued on August 20, 2010 as Special Condition No. 12.

¹ Conference call between TCEQ (Ms. Bonnie Evridge and Mr. Joel Stanford), GAF (Mr. Doug Harris, Mr. Fred Bright, and Mr. Durwin Farlough), Trinity Consultants (Ms. Latha Kambham and Ms. Christine Otto Chambers), and Brown and McCarroll (Mr. Rod Johnson) to discuss two environmentally beneficial projects proposed by GAF.

GAF evaluated PM₁₀ emission reduction options including switching to a cleaner sand. GAF conducted trials and tested sand from various sand suppliers to locate a sand supply that would result in less particulate emissions from the cooling sections, a.k.a. cleaner sand. One particular supplier proved to have the "cleanest" sand; however, switching to this particular sand supply is not a viable option any longer. The company that was going to supply sand to GAF was purchased by another company that plans to use the sand for oil and gas operations only. GAF is still pursuing a "cleaner" sand supply and is additionally proposing to add a scrubber to reduce PM₁₀ emissions. The project to add a scrubber will result in an emissions reduction, but will change the location of the emission point. In addition, the project will reduce off-site impacts.

[With this permit alteration, GAF is requesting authorization to install the scrubber in place of increasing the stack heights on EPNs COOL1 and COOL3. Once the scrubber is installed, GAF will conduct stack testing to determine the emissions rates.] GAF will submit a second permit alteration at that time to reduce the PM₁₀ emissions from EPNs COOL1 and COOL3 on the maximum allowable emission rate table (MAERT) of NSR Permit No. 7711A and to request the removal of Special Condition No. 12 noting the increased stack heights for the cooling sections.] GAF will also conduct air dispersion modeling to demonstrate that with the addition of the controls, the GAF Dallas Plant will demonstrate compliance with the PM₁₀ NAAQS with the cooling sections at their existing heights.

2. PERMIT ALTERATION REQUIREMENTS

The requirements for a permit alteration are addressed below. The permit alteration requirements found in Title 30 of the Texas Administrative Code Section 116.116(c) [30 TAC 116.116(c)] are included in italics.

116.116(c)(1) A permit alteration is:

- (A) a decrease in allowable emissions; or*
- (B) any change from a representation in an application, general condition, or special condition in a permit that does not cause:*
 - (i) a change in the method of control of emissions;*
 - (ii) a change in the character of emissions; or*
 - (iii) an increase in the emission rate of any air contaminant.*

The installation of the control device will result in a decrease in allowable emissions; however, since GAF will be requesting the removal of Special Condition No. 12 from NSR Permit No. 7711A after the scrubber is installed, this proposed alteration will impact a special condition; however, this change does not represent a change in the method of control since EPNs COOL1 and COOL3 are not currently controlled, i.e., going from zero controls to a control device is not considered a change in method of control. The addition of the scrubber will not change the character of the emissions, i.e., no new air contaminants will be emitted, and the addition of the scrubber will not increase emissions of any air contaminant. Instead, this proposed change will reduce emissions of PM₁₀ from EPNs COOL1 and COOL3.

116.116(c)(2) Requests for permit alterations that must receive prior approval by the executive director are those that:

- (A) result in an increase in off-property concentrations of air contaminants;*

- (B) involve a change in permit conditions; or*
(C) affect facility or control equipment performance.

This permit alteration involves a change in Special Condition No. 12 and therefore, requires prior approval from the executive director. The proposed change will not result in an increase in off-property concentrations of air contaminants and will not affect existing facility or control equipment performance.

- 116.116(c)(3) The executive director shall be notified in writing of all other permit alterations not specified in paragraph (2) of this subsection.*

This letter is requesting approval for a permit alteration to TCEQ NSR Permit No. 7711A as outlined in paragraph (2) of this subsection.

- 116.116(c)(4) A request for permit alteration shall include information sufficient to demonstrate that the change does not interfere with the owner or operator's previous demonstrations of compliance with the requirements of §116.111(a)(2)(C) of this title.*

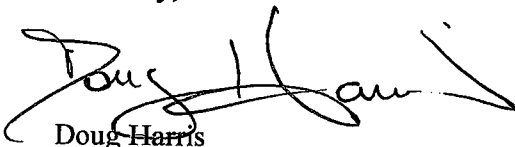
The proposed control device and resulting emission reductions will not interfere with previous demonstrations of compliance with the requirements of 30 TAC 116.111(a)(2)(C) – *Best Available Control Technology*.

- 116.116(c)(5) Permit alterations are not subject to the requirements of §116.111(a)(2)(C) of this title.*

GAF understands that permit alterations are not subject to the requirements of 30 TAC 116.111(a)(2)(C) – *Best Available Control Technology* of this title.

If you have any questions, please call me at (214) 637-8909.

Sincerely,



Doug Harris
Engineering Manager

cc: Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas, Air Pollution Control Program
Mr. Fred Bright, GAF
Mr. David Fuelleman, GAF
Ms. Christine Otto Chambers, Trinity Consultants
Ms. Latha Kambham, Trinity Consultants

02/15/2011 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 163357 PERMIT#: 7711A STATUS: PENDING DISP CODE: _____
RECEIVED: 02/14/2011 PROJTYPE: REVISION AUTHTYPE: CONSTRUCT ISSUED DT: _____
RENEWAL: 10/21/2014
PROJECT ADMIN NAME: ADDITION OF CONTROL DEVICE
PROJECT TECH NAME: ASPHALT ROOFING PRODUCTION FACILITY

Assigned Team: MECH/CONST TEAM

STAFF ASSIGNED TO PROJECT:

OYLER, TONI - REVIEWR1_2 - AP INITIAL REVIEW
TEAM LEADER, M/C - REVIEW ENG - MECH/CONST TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA
COMPANY NAME: Building Materials Corporation of America
CUSTOMER REFERENCE NUMBER: CN602717464

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100788959 ACCOUNT: DB0378S
PERMIT NAME: GAF MATERIALS

REGULATED ENTITY LOCATION: 2600 SINGLETON BLVD
REGION 04 - DFW METROPLEX NEAR CITY: DALLAS COUNTY: DALLAS

CONTACT DATA

CONTACT NAME: MR DOUG HARRIS CONTACT ROLE: RESPONSIBLE OFFICIAL
JOB TITLE: ENGINEERING MANAGER ORGANIZATION: BUILDING MATERIALS CORPORATION OF AMERICA
MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738
PHONE: (214) 637-8909 Ext: 0

PROJECT NOTES:

02/15/2011 DFC 2/15/11.

PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	02/14/2011	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	02/15/2011	
CENTRAL REGISTRY UPDATED	02/15/2011	02/15/2011
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)		
DEFICIENCY CYCLE		
DRAFT PERMIT RFC SENT TO REGION (DATE)		
EMISSIONS MODELING CYCLE DONE BY APPLICANT		
FINAL PACKAGE REWORK CYCLE		
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)		
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)		
MODELING AUDIT CYCLE		
PROJECT RECEIVED BY ENGINEER (DATE)		
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)		
WORKING DRAFT PERMIT REVIEW CYCLE		
WPO FINAL PACKAGE CYCLE		

Permit Unit Type: